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2 District of Nevada

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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 VENONA RICHION, )  
13 Plaintiff, ) Case No. 2:16-CV-02243-GMN-VCF  
14 v. )  
15 NANCY A. BERRYHILL<sup>1</sup>, )  
16 Acting Commissioner of Social Security, )  
17 Defendant. )  
18 \_\_\_\_\_)

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

19 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”),  
20 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm,  
21 due on February 22, 2017, by 30 days, through and including March 24, 2017.

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25 <sup>1</sup> Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d) of the  
Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Acting Commissioner  
Carolyn W. Colvin as the defendant in this suit. No further action needs to be taken to continue this suit  
26 by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 An extension of time is needed because Defendant's counsel has been out of the office  
2 unexpectedly to care for a family member with a medical issue. This request is made in good faith with  
3 no intention to unduly delay the proceedings.

4 Counsel for Defendant conferred with Plaintiff's counsel February 20, 2017, who has no  
5 opposition to this motion.

6 Respectfully submitted this 20<sup>th</sup> day of February 2017.

7 DANIEL G. BOGDEN  
8 United States Attorney

9 /s/ Jennifer A. Kenney  
10 JENNIFER A. KENNEY  
11 Special Assistant United States Attorney

12 OF COUNSEL:

13 DEBORAH LEE STACHEL  
14 Regional Chief Counsel, Region IX

15 IT IS SO ORDERED:

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17 \_\_\_\_\_  
18 UNITED STATES MAGISTRATE JUDGE  
19 DATED: 2-21-2017  
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## **CERTIFICATE OF SERVICE**

I, JENNIFER A. KENNEY, certify that the following individual was served with a copy of the  
**UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service  
identified below:

## **CM/ECF:**

CYRUS SAFA  
Law Offices of Lawrence D. Rohlfing  
12631 East Imperial Highway, Suite C-115  
Santa Fe Springs, CA 90670

**GERALD M. WELT**  
732 Sixth Street, Suite 200-D  
Las Vegas, NV 89101

Dated this 20<sup>th</sup> day of February 2017.

*/s/ Jennifer A. Kenney*  
**JENNIFER A. KENNEY**  
Special Assistant United States Attorney